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MILWAUKEE COUNTY
DEPARTMENT OF HEALTH
& HUMAN SERVICES
**BEHAVIORAL
HEALTH SERVICES**

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Owner Dana James

Policy Area Wraparound
(Wrap, REACH,
youth CCS)-
Administration

#080 Unearned Monies Recoupment Policy

I. POLICY

It is the policy of Children's Community Mental Health Services and Wraparound Milwaukee (hereby referenced as Wraparound Milwaukee) that all Milwaukee County monies an Agency/Vendor is not entitled to, be repaid to Milwaukee County Department of Health and Human Services – Wraparound Milwaukee.

II. PROCEDURE

Unearned monies may have been incurred due to an overpayment, error in billing and/or recoupment related to audit/investigation findings, which includes, but is not limited to, incidents of fraud, waste and abuse. In situations where unearned monies have been identified, the following procedure will be imposed:

1. Agency will notify and/or confirm the details with Wraparound Milwaukee Finance Department via email (wrapfinance@milwaukeecountywi.gov) within two (2) business days of identifying any suspected or confirmed situation of receiving monies that the Agency is not entitled to.
 - a. Agency will provide the following details within their notification:
 - i. Agency Name
 - ii. Provider Name
 - iii. Reason for Repayment
 - iv. Enrollee Name / Service Recipient Name
 - v. Service Code and Service Name

- vi. Applicable Dates of Service
 - vii. Applicable Units of Service
 - viii. Total Amount of Repayment
 - b. If Wraparound Milwaukee identifies unearned monies to be recovered, the Agency will be notified of the details. The agency must confirm and/or provide supporting details as outlined in 1ai-viii.
- 2. Following the receipt of the notification/confirmation, Wraparound Milwaukee Finance Department will review the details and respond to the Agency within two (2) business days to issue the unearned monies finding. The details of the finding will include:
 - a. Details as outlined in 1ai-vii
 - b. Total amount of recoupment
 - c. Repayment Procedure
 - i. For contracted Agencies with available monies scheduled to be paid: Unearned monies will be recouped from the Agency's next scheduled payment(s)
 - 1. Note: Per Fee-for-Service Agreement Section 7: [Wraparound Milwaukee] has authority to adjust pending billings and payments due to the Contractor against any overpayment.
 - ii. For contracted Agencies with no monies scheduled to be paid: Agency must refund all unearned monies via check or money order to Wraparound Milwaukee within ten (10) days of issued finding.
 - iii. For Agencies that are no longer contracted or are inactive: Agency must refund all unearned monies via check or money order to Wraparound Milwaukee within ten (10) days of issued finding.
- 3. Recoupment related to Audit/Investigation findings
 - a. In addition to the procedures and associated time-lines outlined in this policy, the agency must comply with all procedures and time-lines as outlined in the audit/ investigation notification
 - b. Repayment Plan Option: Agency may request to set-up a payment plan to ensure monies are recovered over a reasonable, appropriate period of time.
 - i. Agency must submit request and repayment plan to the Wraparound Milwaukee Finance Department via email
 - ii. Wraparound Milwaukee will review the request and notify the Agency of the approved repayment plan
- 4. All unearned monies will be refunded in full to Wraparound Milwaukee within 60 days of the identified recovery, unless a predetermined time frame is agreed upon between Wraparound Milwaukee and the Agency.
- 5. Failure to comply will the refund of any unearned County funds/monies, may include, but are not limited to, corrective action, conditional status, suspension, denial of any pending or future

contracts and/or termination of the contract with Milwaukee County.

6. Wraparound Milwaukee complies with and follows the procedures outlined in the WI Forward Health Provider Online-Handbook regarding Medicaid claims and overpayment.
 - a. This compliance plan includes, but is not limited to, Wraparound Milwaukee procedure to reimburse/refund the State of WI for all unearned monies for Medicaid covered services that have been identified.
 - b. Excess capitation will be reported to the State of WI by Wraparound Milwaukee within 60 calendar days of the discovery of the unearned monies.

Approval Signatures

| Step Description | Approver | Date |
|------------------|--|-----------|
| | Michael Lappen: BHD Administrator | 8/29/2022 |
| | Matthew Fortman: Fiscal Administrator | 8/29/2022 |
| | Brian McBride: ExDir2 – Program Administrator | 8/29/2022 |
| | Sheri Duquaine: Patient Accounts Manager | 8/26/2022 |
| | Heidi Ciske-Schmidt: Director of Operations Wraparound | 8/25/2022 |